

Statement of Basis of the Federal Operating Permit

Formosa Plastics Corporation, Texas

Site/Area Name: Traffic Facilities

Physical location: 201 Formosa Dr

Nearest City: Point Comfort

County: Calhoun

Permit Number: O1955

Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2821

SIC Name: Plastics Materials

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: June 23, 2015

Operating Permit Basis of Determination

Permit Area Process Description

The Traffic Facilities are storage and loading/unloading operations designed to accommodate chemical production units. Traffic IV is charged with loading liquid products to railcars and trucks and unloading polypropylene from the Olefins units. Marine Traffic loads liquid products and unloads liquid feedstock to and from ships and barges. The process is accomplished by the use of truck and railcar loading facilities, marine barge and ship terminal, tank farm, and pipeline system. The main chemicals handled include: NaOH, EDC, MEG, DEG, TEG, polypropylene, olefins, Pyrolysis fuel oil and gasoline, Naptha, BTX, and HCl.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1484, O1951, O1953, O1954, O1956, O1957, O1958, O3409, O3421

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, PM, NO _x , HAPs, CO, GHG
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Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary

- Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for

large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce

visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.

21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.
- 27.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination *
8FP-D20A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>
8FP-D20B	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>
8FT-Do1	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using an external floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
8FT-Do1	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
8FT-Do2	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
8FT-Do2	40 CFR Part 63, Subpart G	63G-2	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
8FT-Do3	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using an external floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
8FT-Do3	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
8FT-Do9A	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
8FT-Do9A	40 CFR Part 60, Subpart Kb	60KB-3	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
8FT-Do9A	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
8FT-Do9B	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
8FT-Do9B	40 CFR Part 60, Subpart Kb	60KB-3	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
8FT-Do9B	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
8FT-D13	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>

Unit ID	Regulation	Index Number	Basis of Determination*
8FT-D13	40 CFR Part 60, Subpart Kb	60KB-3	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
8FT-D13	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
8FT-D28	30 TAC Chapter 115, Storage of VOCs	R5112-5	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons Control Device Type = Flare
8FT-D28	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Closed vent system (CVS) with a flare used as the control device (fixed roof)
DT-403	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons Control Device Type = Direct-flame incinerator
DT-403	40 CFR Part 63, Subpart G	63G-1	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G). Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. Hard Piping = The closed vent system is constructed of hard piping. Bypass Lines = Closed vent system has no by-pass lines. Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa) Control Device Type = Thermal incinerator Emission Control Type = Closed vent system (CVS) and control device (fixed roof) Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%. Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).

Unit ID	Regulation	Index Number	Basis of Determination*
DT-404	30 TAC Chapter 115, Storage of VOCs	R5112-2	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
DT-404	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Thermal incinerator</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
FT-D10	30 TAC Chapter 115, Storage of VOCs	R5112-2	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
FT-D10	40 CFR Part 63, Subpart EEEE	63EEEE-1	<p>Product Stored = Organic HAP containing liquid other than crude oil.</p>
FT-D14	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
FT-D14	40 CFR Part 60, Subpart Kb	60KB-3	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>

Unit ID	Regulation	Index Number	Basis of Determination*
FT-D18	30 TAC Chapter 115, Storage of VOCs	R5112-3	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p> <p>Control Device Type = Flare</p>
FT-D18	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
FT-D19	30 TAC Chapter 115, Storage of VOCs	R5112-4	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p> <p>Control Device Type = Flare</p>
FT-D19	40 CFR Part 63, Subpart EEEE	63EEEE-1	Product Stored = Organic HAP containing liquid other than crude oil.
8F-EG	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	<p>Chapter 115 Facility Type = Marine terminal</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
8F-EG	40 CFR Part 63, Subpart Y	63Y-0	<p>Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Pressure = Vapor pressure is less than 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p>
BTX_B	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	<p>Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system.</p> <p>Chapter 115 Facility Type = Marine terminal</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p>
BTX_B	40 CFR Part 61, Subpart BB	61BB-1	<p>Negative Applicability = The loading rack loads materials other than benzene-laden waste, gasoline, crude oil, natural gas liquids, petroleum distillates or benzene-laden liquid from a coke by-product plant.</p> <p>Benzene By Weight = Concentration of benzene by weight in the liquid which is loaded is less than 70% benzene by weight.</p> <p>Annual Amount Loaded = Annual amount loaded is greater than or equal to 1.3 million liters (343,424 gallons).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
BTX_B	40 CFR Part 63, Subpart Y	63Y-1	<p>Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p> <p>Subpart BB Applicability = Marine vessel loading operations are subject to and complying with 40 CFR Part 61, Subpart BB.</p>
C4_B	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	<p>Chapter 115 Control Device Type = No control device.</p> <p>Chapter 115 Facility Type = Marine terminal</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p>
C4_B	40 CFR Part 63, Subpart Y	63Y-1	<p>Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Pressure = Vapor pressure is less than 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p>
C9+_B	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	<p>Chapter 115 Facility Type = Marine terminal</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
C9+_B	40 CFR Part 63, Subpart Y	63Y-0	<p>Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Pressure = Vapor pressure is less than 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p>
EDC_S/B	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	<p>Chapter 115 Control Device Type = Vapor control system with a direct flame incinerator.</p> <p>Chapter 115 Facility Type = Marine terminal</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p>
EDC_S/B	40 CFR Part 63, Subpart Y	63Y-1	<p>Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p> <p>Subpart BB Applicability = Marine vessel loading operations are not subject to and complying with 40 CFR Part 61, Subpart BB.</p> <p>Material Loaded = Material other than crude oil or gasoline.</p> <p>HAP Impurities Only = Marine vessel loading operations at loading berths transfer liquids containing organic hazardous air pollutants other than as impurities.</p> <p>Source Emissions = Source with emissions less than 10 and 25 tons.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
PF-BARGFUG	40 CFR Part 61, Subpart BB	61BB-1	<p>Negative Applicability = The loading rack loads materials other than benzene-laden waste, gasoline, crude oil, natural gas liquids, petroleum distillates or benzene-laden liquid from a coke by-product plant.</p> <p>Benzene By Weight = Concentration of benzene by weight in the liquid which is loaded is less than 70% benzene by weight.</p> <p>Annual Amount Loaded = Annual amount loaded is greater than or equal to 1.3 million liters (343,424 gallons).</p>
PF-Lo2	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
PF-SHIPFUG	40 CFR Part 63, Subpart Y	63Y-2	<p>CEMS = Continuous emissions monitoring system (CEMS) is not being used.</p> <p>Subpart Y Facility Type = New onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Balancing System = Emissions are not reduced by a vapor balancing system.</p> <p>Documenting Vapor Tightness = Electing to comply with the vapor tightness documentation in 40 CFR 63.567(b)(5)(ii).</p> <p>Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p> <p>Subpart BB Applicability = Marine vessel loading operations are not subject to and complying with 40 CFR Part 61, Subpart BB.</p> <p>Subpart Y Control Device Type = Flare.</p> <p>Material Loaded = Material other than crude oil or gasoline.</p> <p>HAP Impurities Only = Marine vessel loading operations at loading berths transfer liquids containing organic hazardous air pollutants other than as impurities.</p> <p>Alternate Monitoring = Complying with the control device specific monitoring procedures in 40 CFR § 63.564.</p> <p>Alternate Test Procedure = Complying with the test procedures in 40 CFR § 63.565.</p> <p>Vent Stream By-Pass = There are no valves that could route displaced vapors to the atmosphere.</p>
PY _{GASB}	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	<p>Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system.</p> <p>Chapter 115 Facility Type = Marine terminal</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p>
PY _{GASB}	40 CFR Part 61, Subpart BB	61BB-1	<p>Negative Applicability = The loading rack loads materials other than benzene-laden waste, gasoline, crude oil, natural gas liquids, petroleum distillates or benzene-laden liquid from a coke by-product plant.</p> <p>Benzene By Weight = Concentration of benzene by weight in the liquid which is loaded is less than 70% benzene by weight.</p> <p>Annual Amount Loaded = Annual amount loaded is greater than or equal to 1.3 million liters (343,424 gallons).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
PY _{GASB}	40 CFR Part 63, Subpart Y	63Y-1	Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore). Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility. Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg. Subpart BB Applicability = Marine vessel loading operations are subject to and complying with 40 CFR Part 61, Subpart BB.
WO _{ILB}	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-0	Chapter 115 Facility Type = Marine terminal Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. True Vapor Pressure = True vapor pressure is less than 1.5 psia.
WO _{ILB}	40 CFR Part 63, Subpart Y	63Y-0	Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore). Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility. Vapor Pressure = Vapor pressure is less than 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.
1018	30 TAC Chapter 111, Visible Emissions	R1111-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
1018	40 CFR Part 60, Subpart A	60A-3	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Steam-assisted Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
8F-Do1	30 TAC Chapter 111, Visible Emissions	R1111-0	Emergency/Upset Conditions Only = Flare is used only under emergency or upset conditions. Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.
8F-Do1	40 CFR Part 60, Subpart A	60A-0	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
8F-Do3	30 TAC Chapter 111, Visible Emissions	R1111-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
8F-Do3	40 CFR Part 60, Subpart A	60A-1	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Air-assisted
8F-Do4	30 TAC Chapter 111, Visible Emissions	R1111-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.

Unit ID	Regulation	Index Number	Basis of Determination*
8F-Do4	40 CFR Part 60, Subpart A	60A-2	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
8F-Do5	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
8F-Do5	40 CFR Part 60, Subpart A	60A-2	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
8F-Do6	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
8F-Do6	40 CFR Part 60, Subpart A	60A-2	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
8F-Do7	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
8FD-FUGDOCK	40 CFR Part 60, Subpart VV	60VV-2	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit does not contain compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for sampling connection systems.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Pumps in Light Liquid Service = The fugitive unit does not contain pumps in light liquid service.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit does not contain open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>
8FD-FUGDOCK	40 CFR Part 61, Subpart J	61J-2	<p>40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR</p> <p>ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS ANY COMPONENT(S) IN BENZENE SERVICE</p> <p>40 CFR 61 (NESHAP) SUBPART J ALTERNATE MEANS OF EMISSION LIMITATION (AMEL) = NOT USING ALTERNATE MEANS OF EMISSION LIMITATION.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
8FD-FUGDOCK	40 CFR Part 61, Subpart V	61V-2	<p>Closed-vent Systems = No alternate method of emission limitation is used for closed vent systems or other control devices.</p> <p>Compressors = The fugitive unit does not contain compressors in VHAP service.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices in VHAP service.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit does not contain pressure relief devices in gas/vapor VHAP service.</p> <p>Product Accumulator Vessels = The fugitive unit does not contain product accumulator vessels.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems in VHAP service.</p> <p>Vacuum Service = The fugitive unit does not contain components in vacuum service.</p> <p>Valves = The fugitive unit contains valves in VHAP service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems in VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for sampling connection systems.</p> <p>VHAP Service = The fugitive unit contains components in VHAP service.</p> <p>Complying with 40 CFR § 61.242-11(f)(1) = Closed vent systems are complying with § 61.242-11(f)(1).</p> <p>Pumps = The fugitive unit does not contain pumps in VHAP service.</p> <p>Complying with 40 CFR § 61.242-5 = Sampling connection systems are complying with § 61.242-5.</p> <p>Complying with 40 CFR § 61.242-7 = Valves are complying with § 61.242-7.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors in VHAP service.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines in VHAP service.</p> <p>Pressure Relief Devices in Liquid Service = The fugitive unit does not contain pressure relief devices in liquid VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for open-ended valves or lines.</p> <p>Complying with 40 CFR § 61.242-6 = Open-ended valves or lines are complying with § 61.242-6.</p> <p>Complying with 40 CFR § 61.242-8 = Flanges and other connectors are complying with § 61.242-8.</p>
8FD-FUGDOCK	40 CFR Part 63, Subpart EEEE	63EEEE-1	<p>Component Service Hours = Pumps, valves or sampling connections at the Organic Loading Distribution Facility operate in organic HAP service 300 hours/yr or more.</p>
8FD-FUGDOCK	40 CFR Part 63, Subpart H	63H-2	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE ANY (COMPRESSORS) = COMPONENT NOT PRESENT EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL) FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT

Unit ID	Regulation	Index Number	Basis of Determination*
8FD-FUGINLD	40 CFR Part 60, Subpart VV	60VV-3	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit does not contain compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit contains pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for sampling connection systems.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Pumps in Light Liquid Service = The fugitive unit does not contain pumps in light liquid service.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Complying with 40 CFR § 60.482-8 = Pumps in heavy liquid service are complying with § 60.482-8.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for open-ended valves or lines.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.</p> <p>Complying with 40 CFR § 60.482-8 = Valves in heavy liquid service are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>
8FD-FUGINLD	40 CFR Part 63, Subpart H	63H-3	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
8FD-FUGTANK	40 CFR Part 60, Subpart VV	60VV-1	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit does not contain compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for sampling connection systems.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit does not contain open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service.</p> <p>Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>
8FD-FUGTANK	40 CFR Part 61, Subpart J	61J-1	<p>40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR</p> <p>ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS ANY COMPONENT(S) IN BENZENE SERVICE</p> <p>40 CFR 61 (NESHAP) SUBPART J ALTERNATE MEANS OF EMISSION LIMITATION (AMEL) = NOT USING ALTERNATE MEANS OF EMISSION LIMITATION.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
8FD-FUGTANK	40 CFR Part 61, Subpart V	61V-1	<p>Closed-vent Systems = No alternate method of emission limitation is used for closed vent systems or other control devices.</p> <p>Compressors = The fugitive unit does not contain compressors in VHAP service.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices in VHAP service.</p> <p>Flare = The fugitive unit contains flares.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit does not contain pressure relief devices in gas/vapor VHAP service.</p> <p>Product Accumulator Vessels = The fugitive unit does not contain product accumulator vessels.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems in VHAP service.</p> <p>Vacuum Service = The fugitive unit does not contain components in vacuum service.</p> <p>Valves = The fugitive unit contains valves in VHAP service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems in VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for sampling connection systems.</p> <p>VHAP Service = The fugitive unit contains components in VHAP service.</p> <p>Complying with 40 CFR § 61.242-11(f)(1) = Closed vent systems are complying with § 61.242-11(f)(1).</p> <p>Pumps = The fugitive unit contains pumps in VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for pumps.</p> <p>Complying with 40 CFR § 61.242-11(d) = Flares are complying with § 61.242-11(d).</p> <p>Complying with 40 CFR § 61.242-5 = Sampling connection systems are complying with § 61.242-5.</p> <p>Complying with 40 CFR § 61.242-7 = Valves are complying with § 61.242-7.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors in VHAP service.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines in VHAP service.</p> <p>Pressure Relief Devices in Liquid Service = The fugitive unit does not contain pressure relief devices in liquid VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for open-ended valves or lines.</p> <p>Complying with 40 CFR § 61.242-2 = Pumps are complying with 40 CFR § 61.242-2.</p> <p>Complying with 40 CFR § 61.242-6 = Open-ended valves or lines are complying with § 61.242-6.</p> <p>Complying with 40 CFR § 61.242-8 = Flanges and other connectors are complying with § 61.242-8.</p>
8FD-FUGTANK	40 CFR Part 63, Subpart EEEE	63EEEE-1	<p>Component Service Hours = Pumps, valves or sampling connections at the Organic Loading Distribution Facility operate in organic HAP service 300 hours/yr or more.</p>
8FD-FUGTANK	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
IBLFUG	40 CFR Part 60, Subpart VV	60VV-5	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit contains compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit contains flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for compressors.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-10 = Flares are complying with § 60.482-10.</p> <p>Complying with 40 CFR § 60.482-3 = Compressors are complying with § 60.482-3.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit does not contain open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service.</p> <p>Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>
IBLFUG	40 CFR Part 63, Subpart H	63H-4	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE = NONE OF THE EQUIPMENT IN ORGANIC HAP SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR IS IN HEAVY LIQUID SERVICE</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>
PPU-FUG-1	40 CFR Part 60, Subpart VV	60VV-4	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit contains closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit contains compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit contains flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for closed vent or vapor collection systems.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-10 = Flares are complying with § 60.482-10.</p> <p>Complying with 40 CFR § 60.482-3 = Compressors are complying with § 60.482-3.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service.</p> <p>Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for open-ended valves or lines.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.</p> <p>Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
TRAFFIC	40 CFR Part 63, Subpart F	63F-1	<p>Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).</p> <p>Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.</p> <p>Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.</p> <p>Heat Exchange System = No heat exchange system is utilized.</p>

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1226	Issuance Date: 07/03/2013
PSD Permit No.: PSDTX1234	Issuance Date: 04/02/2013
PSD Permit No.: PSDTX1236	Issuance Date: 05/28/2013
PSD Permit No.: PSDTX1238	Issuance Date: 05/28/2013
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 19168	Issuance Date: 07/03/2013
Authorization No.: 19198	Issuance Date: 04/02/2013
Authorization No.: 19199	Issuance Date: 05/28/2013
Authorization No.: 19871	Issuance Date: 05/28/2013
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 86	Version No./Date: 07/20/1992
Number: 86	Version No./Date: 10/04/1995

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in

the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit’s compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 8FT-D28	
Control Device ID No.: 8F-Do6	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-5
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Four times per hour	
Averaging Period: n/a	
Deviation Limit: Loss of Pilot Flame	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: 8FT-D28	
Control Device ID No.: 8F-Do6	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: An instrument reading of at least 500 ppm above background.	
Basis of monitoring: It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.	

Unit/Group/Process Information	
ID No.: 8FT-D28	
Control Device ID No.: 8F-Do6	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Any defects, such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.	
Basis of monitoring: It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and a recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.	

Unit/Group/Process Information	
ID No.: DT-403	
Control Device ID Nos.: 6002A, 6002B, and 6002C	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-2
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum firebox temperature maintained at 1634 F for EPN 6002A, and 1658 F for EPN 6002B, and 1642 F for EPN 6002C.	
Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: DT-404	
Control Device ID Nos.: 6002A, 6002B, and 6002C	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-2
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum firebox temperature maintained at 1634 F for EPN 6002A, and 1658 F for EPN 6002B, and 1642 F for EPN 6002C.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: FT-D10	
Control Device ID Nos.: 6002A, 6002B, and 6002C	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-2
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum firebox temperature maintained at 1634 F for EPN 6002A, and 1658 F for EPN 6002B, and 1642 F for EPN 6002C.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: FT-D18	
Control Device ID No.: 8F-Do4	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-3
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Four times per hour	
Averaging Period: n/a	
Deviation Limit: Loss of Pilot Flame	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: FT-D19	
Control Device ID No.: 8F-Do5	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-4
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Four times per hour	
Averaging Period: n/a	
Deviation Limit: Loss of Pilot Flame	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on June 23, 2015.

Site rating: 7.08 / Satisfactory

Company rating: 6.83 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55 ; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating?No

Permit reviewer notes: NA

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?No

2. Is a compliance plan and schedule included in the permit?.....No

Permit reviewer notes: NA

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes

OP-UA21 - Grain Elevator Attributes

OP-UA22 - Printing Attributes

OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes

OP-UA25 - Synthetic Fiber Production Attributes

OP-UA26 - Electroplating and Anodizing Unit Attributes

OP-UA27 - Nitric Acid Manufacturing Attributes

OP-UA28 - Polymer Manufacturing Attributes

OP-UA29 - Glass Manufacturing Unit Attributes

OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes

OP-UA31 - Lead Smelting Attributes

OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes

OP-UA33 - Metallic Mineral Processing Plant Attributes

OP-UA34 - Pharmaceutical Manufacturing

OP-UA35 - Incinerator Attributes

OP-UA36 - Steel Plant Unit Attributes

OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes